Department of Energy

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94-DOE-07024

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Mr. Martin Hestmark U. S. Environmental Protection Agency, Region VIII ATTN: Rocky Flats Project Manager, 8HWM-RI 999 18th Street, Suite 500, 8WM-C

Denver, Colorado 80202-2405 Mr. Gary Baughman Hazardous Waste Facilities Unit Leader Colorado Department of Health 4300 Cherry Creek Drive South Denver, Colorado 80222-1530

Gentlemen:

The Final Phase III RCRA Facility Investigation/Remedial Investigation (RFI/RI) report for Operable Unit (OU) No. 1 (881 Hillside) identified radionuclides, polynuclear aromatic hydrocarbons (PAHs), and polychlorinated biphenyls (PCBs) as contaminants of concern (COCs) in surface soils. The radionuclides identified as COCs in the surface soils were uranium, americium, and plutonium. The primary source for surface soil contamination by radionuclides was the 903 pad at OU 2 (903 Pad, Mound and East Trenches Area). As indicated in the OU 1 RFI/RI, the occurrence of PCBs and PAHs in the surface soils could not be related to a particular source.

As per paragraph 191 of the Interagency Agreement, we are proposing to modify work by administratively transferring the further study and remediation of surface soil contaminates at OU 1 to OU 2. This will be done for the Corrective Measures Study/Feasibility Study (CMS/FS), the development of a Proposed Plan (PP), and for writing the Corrective Action Decision/Record of Decision (CAD/ROD). The purpose for this administrative transfer is to consolidate the RCRA/CERCLA activities that are associated with the dispersion of radionuclides from the 903 pad. This transfer assures that the development of General Response Actions, the screening of remedial alternatives, and conducting the 9-criteria analysis of the CMS/FS is handled for the entire plume of dispersion throughout OU 1 and OU 2. This would facilitate the development of one PP, and the approval of one CAD/ROD for this contamination. This administrative impact is minimal as both OU 1 and OU 2 are joint lead, however the dispute process would shift from the State process to the Environmental Protection Agency's process.

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Reviewed for Addressee Corres, Control RFP

Although the PAHs and PCBs at OU 1 are not associated with the 903 pad dispersion plume, they occur in the same surface soil media as the radionuclides. For this reason, these contaminants must be considered together in calculating soil volumes, comparing costs, and for the screening and analysis of remediation alternatives. For this reason, these contaminants will be included as part of the OU 2 CMS/FS and all succeeding activities.

The surface soil contamination associated with the four radionuclide hot spots identified in the OU 1 RFI/RI report will not be transferred to OU 2. These are being proposed for early action (Ref: 94-DOE-06683).

Ref Ltr. #

DOE ORDER # 5400

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M. Hestmark & G. Baughman 94-Doe-07024

Please direct any questions regarding this material to Scott Grace of my staff at 966-7199.

Sincerely,

Steven W. Slaten

IAG Project Coordinator

cc:

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